

The Honorable Ricardo S. Martinez

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

NATIONAL RIFLE ASSOCIATION OF
AMERICA, INC., SECOND AMENDMENT
FOUNDATION, INC., ADRIAN J. COOMBES,
ROELOF KROES, PHILIP GRADY,

Plaintiffs

v.

STATE OF WASHINGTON, LIZ LUCE,
DIRECTOR, DEPARTMENT OF LICENSING
and PAUL D. AYERS, CHIEF OF POLICE
ISSAQUAH POLICE DEPARTMENT,

Defendants.

Civil Case No.: C08-1613RSM

DECLARATION OF ADRIAN J.
COOMBES

ADRIAN J. COOMBES hereby declares under penalty of perjury pursuant to 28

U.S.C. § 1746 as follows:

1. I am a resident of Issaquah, Washington. I am a British National, and hold a
“green card,” meaning that I am lawfully admitted into the United States with the status of
legal permanent resident.



1 2. I have been a legal permanent resident alien in the United States for over ten
2 years. I am married to a United States citizen.

3 3. I was issued an Alien Firearms License (AFL) and a Concealed Pistol License
4 (CPL) in 1999 and have held such licenses since then. My current AFL expires on February
5 19, 2009. My current CPL, which was issued by and must be renewed by the Issaquah Police
6 Department, expires on April 1, 2009. Defendant Chief of Police Paul D. Ayers will not
7 renew my license without a valid AFL.

8 4. I am employed in Service and Sales at Wade's Eastside Guns & Bellevue
9 Range, Bellevue, Washington. I will lose my job if I cannot get my licenses renewed.

10 5. I own a valuable firearm collection which I will lose if I cannot get my licenses
11 renewed.

12 6. I participate in the shooting sports, including taking training in, teaching and
13 competing in, handgun, rifle, and shotgun activities. I will be prohibited from such activities
14 if I cannot get my licenses renewed.

15 7. I am a member in good standing in the National Rifle Association.

16 8. I have not been convicted or found not guilty by reason of insanity of any
17 felony or firearm offense.

18 9. There are no criminal charges currently pending against me.

19 10. I am not subject to any court order or injunction regarding firearms.

20 11. I have no warrant outstanding for my arrest from any court of competent
21 jurisdiction.

22 12. I have not been involuntarily committed for mental health treatment.
23



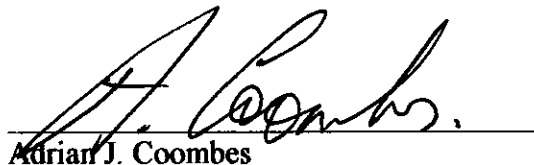
1 13. I am over 21 years of age.

2 14. I have never been ordered to forfeit a firearm.

3 15. By email dated August 6, 2008, Bruce W. Tanaka, Firearms Unit Program
4 Manager, Department of Licensing, Business and Professions Division, verified to me that the
5 DOL cannot access FBI criminal history records through local law enforcement and thus
6 would not issue or renew my Alien Firearm License. Mr. Tanaka warned me in that email:
7 "DOL's hands are tied. I would recommend you not be in possession of your weapons when
8 and if your license expires. . . . [I]f charged and convicted of a class C felony, you would
9 never be able to be in possession of a firearm and it's a deportable offense."

10 16. I will suffer irreparable injury if my AFL and CPL are not renewed, including
11 the loss of valuable property, the inability to possess firearms for recreational purposes and
12 lawful self-defense, and the loss of my job.

13 Dated and signed December 07, 2008 at ISSAQUAH, Washington.

14
15 
16 Adrian J. Coombes

17
18 
19
20
21
22
23